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SMITH'S FOOD & DRUG CENTERS, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FELICIA THOMAS,

Plaintiff,

vs.

SMITH'S FOOD & DRUG CENTERS, INC.;
DOES 1-20 and ROE BUSINESS ENTITIES
1-20, inclusive,

Defendants.

Case No. 2:21-cv-00920-JAD-NJK

**STIPULATION TO EXTEND
DATE FOR FILING THE JOINT PRE
TRIAL ORDER**

(FIRST REQUEST)

WHEREAS, the parties need additional time to complete the Joint Pre-Trial Order. Both parties have requested Plaintiff's disability records from the Social Security Administration; however, it has been several months since the records were requested and, despite the parties' best efforts to follow up with the requests, the Social Security Administration has to date not responded. The records are of critical importance to the Negligence elements of causation and damages. In addition, Defendant is still waiting for Plaintiff's medical records from various providers in Battle Creek, Michigan as well as records from the Mike O'Callaghan Military Medical Center in Nevada. These records are needed by both parties in order to get the case ready for a Settlement Conference, Private Mediation and trial.

IT IS HEREBY STIPULATED by and between Defendant SMITH'S FOOD & DRUG CENTERS, INC., by and through its counsel GREGORY A. KRAEMER, ESQ., of the law firm COOPER LEVENSON, P.A., and

1 Plaintiff FELECIA THOMAS, by and through her counsel, CHARLES S. JACKSON, ESQ. of the
2 law firm HICKS & BRASIER, PLLC., that the date for filing the Joint Pre Trial Order be extended
3 from March 9, 2022 until April 8, 2022.

4 Respectfully submitted this 9th day of March, 2022.

5 HICKS & BRASIER, PLLC

COOPER LEVENSON, P.A

6 /s/ Charles S. Jackson

/s/Gregory A. Kraemer

7 CHARLES S. JACKSON, ESQ.

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10 FELICIA THOMAS

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Attorneys for Defendant

SMITH'S FOOD & DRUG CENTERS, INC.

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15 IT IS SO ORDERED:

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18 UNITED STATES MAGISTRATE JUDGE

DATED: March 10, 2022
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